Case 1:21-cr-00056-JPC Document 71 Filed 11/10/21 Page 1 of 2

Law Offices of Ezra Spilke

1825 Foster Avenue, Suite 1K
Brooklyn, New York 11230
t: (718) 783-3682
e: ezra@spilkelaw.com
www.spilkelaw.com
November 10, 2021

By ECF

The Honorable John P. Cronan United States District Court Southern District of New York 500 Pearl Street New York, New York 10007

Re: United States v. Roderique et al., No. 21 Cr. 56 (JPC) Exclusion of Time to May 23, 2022

Dear Judge Cronan:

We write jointly in response to the Court's order issued today. To make explicit what was previously implied, defendant Kareem Roderique is requesting a continuance to May 23, 2022. The Court directed the parties to advise the Court as to their position on the exclusion of time under the Speedy Trial Act through May 23, 2022. The Government moves for an exclusion of time from April 4 to May 23, 2022. The defendants have no objection.

As to the grounds for the exclusion, the ends of justice served by a continuance outweigh the interests of the public and the defendants in a speedy trial. Additional time is reasonably necessary to accommodate defense counsel's trial schedule. The defendants have an interest in the continuity of counsel who are familiar with the case and with the discovery. The additional time will allow counsel to adequately prepare for trial in this case without the interference of preparing for another trial. We appreciate the Court's considerate attention to this matter.

Respectfully submitted,

[Signatures continued on next page]

/s/ Ezra Spilke

Ezra Spilke 1825 Foster Avenue, Suite 1K Brooklyn, New York 11230

Tel: (718) 783-3682

Counsel for Kareem Roderique

/s/ Daniel Welsh

Daniel J. Welsh 26 Journal Square Suite 300 Jersey City, NJ 07306 Tel: 201-798-4100

Counsel for Robert Shannon

Case 1:21-cr-00056-JPC Document 71 Filed 11/10/21 Page 2 of 2

Hon. John P. Cronan

Re: Exclusion of Time to May 23, 2022

November 10, 2021

Page 2 of 2

/s/ Wanda Akin

Wanda M. Akin Wanda Akin & Associates One Gateway Center Ste. 2600 Newark, NJ 07102 Tel: (973)-623-6834 /s/ Michael Herman
Michael Ross Herman
David Robles
United States Attorney's Office
Southern District of New York
1 St. Andrew's Plaza

New York, NY 10007 Tel: (212) 637-2221

cc: All counsel of record by ECF

Counsel for Nikia King

The parties' request is granted. The trial ready date is adjourned to May 23, 2022, and the parties should be prepared to proceed with trial on that date. The Court will exclude time until May 23, 2022 under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A). The Court finds that the ends of justice served by excluding such time outweigh the interests of the public and the Defendants in a speedy trial, and is necessary to allow the parties to prepare for trial without the interference of preparing for another trial.

SO ORDERED.

Date: November 10, 2021

New York, New York

JOHN P. CRONAN United States District Judge